

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**RHEE BROS., INC.**

\*

**Plaintiff**

\*

**CIVIL ACTION NO. AMD 01CV 1894**

**v.**

\*

**HAN AH REUM, CORP., et al.**

\*

**Defendants**

\*\*\*\*\*

**PLAINTIFF'S CERTIFIED STATEMENT OF FEES AND COSTS**

Plaintiff, Rhee Bros., Inc. ("Rhee Bros."), by and through its undersigned counsel, Jonathan Ilsong Ahn and Semmes, Bowen & Semmes, presents this Certified Statement of Fees and Costs pursuant to this Court's Order, dated June 21, 2003, and entered on June 23, 2003.

The attorneys of record and the firm associates performed the tasks in connection with

- (1) Preparation and filing of Plaintiff's Motion to Reopen the Case and to Enforce the Settlement Agreement Against Defendant Seoul Shik Poom, Inc. together with a proposed Order (consisting of 5 pages and Exhibits A to D);
- (2) Review and analysis of Defendant's Opposition to Plaintiff's Motion to Enforce Settlement Agreement and For Costs (consisting of 5 pages; cited authorities in support of Defendant's Opposition); and
- (3) Research, preparation and filing of Plaintiff's Reply Memorandum in Support of Motion to Reopen the Case and to Enforce Settlement Agreement Against Defendant Seoul Shik Poom, Inc. (consisting of 7 pages and supporting Affidavit of Jonathan Ilsong Ahn; authorities to rebut Defendant's cited authorities and to support Plaintiff's Motion).

Counsel has reviewed its billing records, and a list of the fees and costs incurred by and charged to Rhee Bros. , which is provided as follows and the detail of the charges are provided in attached Exhibits A and B:

**Total Fees in connection with Plaintiff's Motion to Reopen:     \$1818.00**

**Total Fees in connection with Plaintiff's Reply Memorandum: \$2992.50**

**Costs:           Waived (no charge for electronic filing and first class mail charges)**

**Grand Total of Fees and Costs:                                     \$4810.50**

WHEREFORE, Plaintiff respectfully requests, pursuant to the Court's Order dated June 21, 2003, that Defendant Seoul Shik Poom, Inc. be ordered to pay to Rhee Bros. the total sum of \$4810.50 in fees and costs that it incurred as set forth herein.

Respectfully submitted,

/s/  
\_\_\_\_\_  
Jonathan I. Ahn  
James A. Johnson  
Kenneth S. Knuckey  
Semmes, Bowen & Semmes  
250 W. Pratt Street  
Baltimore, Maryland 21201  
(410) 539-5040 (Main)  
(410) 539-5223 (Fax)

Attorneys for Plaintiff, Rhee Bros., Inc.

#### **ATTORNEY'S CERTIFICATION**

I, Jonathan Ilsong Ahn, counsel for Plaintiff, Rhee Bros., Inc., certify under penalty of perjury that I have reviewed the regular billing statements submitted by Semmes, Bowen & Semmes to Rhee Bros., Inc., and that the foregoing list of work performed is a true and correct statement of the fees and costs actually incurred by and charged to Rhee Bros., Inc. for counsel's (1) preparation of its Motion to Reopen the Case and to Enforce Settlement Agreement Against Defendant Seoul Shik Poom, Inc., (2) review of Defendant Seoul Shik Poom, Inc.'s Opposition to Plaintiff's Motion to Enforce Settlement Agreement, and (3) preparation of its Reply Memorandum in Support of its Motion to Reopen the Case and to Enforce Settlement Agreement Against Defendant Seoul Shik Poom.

/s/  
\_\_\_\_\_  
Jonathan Ilsong Ahn  
Attorney for Plaintiff, Rhee Bros., Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of June, 2003, a copy of the foregoing Plaintiff's Certified Statement of Fees and Costs was delivered, via electronic distribution through the United States District Court for the District of Maryland, to the following parties:

David A. Roling, Esq.  
Wharton Levin Ehrmantraut Klein & Nash  
104 West Street  
P.O. Box 551  
Annapolis, Maryland 21404-0551

Attorneys for Defendant Seoul Shik Poom, Inc.

Benjamin Lambiotte, Esq.  
Garvey Schubert & Barer  
1000 Potomac Street, N.W., Fifth Floor  
Washington, D.C. 20007

Attorneys for Defendants Han Ah Reum, Corp.,  
HAR Wheaton, Inc., and Il Yeon Kwon.

H. Patrick Stringer, Esq.  
Mudd, Harrison & Burch  
300 Jefferson Building  
105 W. Chesapeake Avenue  
Towson, Maryland 21204

Attorney for Defendant HAR Wheaton, Inc.

And, via first class mail, postage prepaid, to

Stephen C. Leckar, Esq.  
Butera & Andrews  
1301 Pennsylvania Ave., N.W. Suite 500  
Washington, D.C., 20004

Attorneys for Defendants Han Ah Reum, Corp.,  
HAR Wheaton, Inc., and Il Yeon Kwon.

/s/  
\_\_\_\_\_  
Jonathan Ilsong Ahn

Exhibit A  
 To Plaintiff's Certified Statement of Fees and Costs  
Rhee Bros., Inc. v. Han Ah Reum, Corp. et al. (AMD 01CV1894)

Re: Plaintiff's Motion to Reopen the Case and to Enforce Settlement Agreement Against Defendant Seoul Shik Poom, Inc.

<u>Date</u>	<u>Attorney</u>	<u>Time (hrs.)</u>	<u>Amount</u>	<u>Description of work performed</u>
5/22/03	J. Ahn	2.0	\$450.00	Telephone conference with David Roling (regarding his position; do what you got to do; client jerking him around; may decline the representation); review correspondence file; draft motion to reopen & reinforce settlement agreement; telephone message to client <b>(Reduced 0.5 for telephone conference with David Roling and Tel message to Client)</b>
5/22/03	J. Ahn	2.0	\$450.00	Review all previous correspondence between Ahn and James Wharton and David Roling in preparation of the Motion; draft and revise Motion to Reopen and Enforce Settlement Agreement
5/22/03	J. Ahn	0.3	\$67.50	Review letter from David Roling (detailing the his client's proposed changes to the agreed documents)
5/23/03	J. Johnson	0.9	\$243.00	Draft and revise response letter to David Roling regarding his client's proposed changes to the settlement documents;
5/23/03	J. Ahn	1.5	\$337.50	Review and revise Motion and Order to Reopen; review a letter from David Roling (regarding to the agreed settlement documents, claiming that he was out of the loop for the settlement agreement); draft a response letter to David Roling; . . . <b>(Reduced 1 hour for correspondences and communication with client and with Defendant HAR's attorney Steve Leckar)</b>
5/23/03	J. Ahn	1.2	\$270.00	Conference with Mr. Johnson; finalize Motion and exhibits; revise letter to Mr. Roling
		7.9	\$1818.00	

Rates:	Jonathan Ilsong Ahn	\$225/hour	Total Hours: 7.0
	James A. Johnson	\$270/hour	Total Hours: 0.9

Exhibit B  
 To Plaintiff's Certified Statement of Fees and Costs  
Rhee Bros., Inc. v. Han Ah Reum, Corp. et al. (AMD 01CV1894)

Re: Plaintiff's Reply Memorandum

<u>Date</u>	<u>Attorney</u>	<u>Time (hrs.)</u>	<u>Amount</u>	<u>Description of work performed</u>
6/6/03	J. Ahn	0.5	\$112.50	Review Defendant SSP's opposition to Plaintiff's Motion to Reopen & Enforce Settlement Agreement
6/11/03	J. Ahn	2.1	\$472.50	Research attorney-client relationship; binding authority, agency; conference with Ken Knuckey (regarding the research, instructions to draft Plaintiff's reply to Defendant's opposition to Plaintiff's Motion to Reopen the case and to enforce the settlement agreement); review and analyze SSP's proposed changes with the final documents agreed by SSP
6/12/02	J. Ahn	0.5	\$112.50	Conference with Ken Knuckey (regarding SSP's proposed changes; the proposed changes are substantive and significant; should be included in the reply to Defendant's opposition to Plaintiff's motion)
6/18/03	J. Ahn	1.7	\$382.50	Draft Jonathan Ahn's affidavit in support of Plaintiff's Reply to Defendant SSP's Opposition to Plaintiff's Motion to Enforce Settlement Agreement
6/18/03	K. Knuckey	4.0	\$760.00	Preparation of Reply Memorandum regarding Motion to Reopen Case and to Enforce Settlement
6/19/03	T. Lennon	1.2	\$168.00	Performed research to review cases cited in Defendant SSP's opposition. Report research findings to Ken Knuckey
6/19/03	D. Keough	1.1	\$154.00	Follow-up research; circumstances under which an agent may have actual, implied authority and/or apparent authority to bind agent as well as the type of conduct required for such authority to exist. Report the findings to Ken Knuckey
6/19/03	K. Knuckey	3.7	\$703	Conference with Tammy Lennon and Don Keough regarding their research and findings; preparation of and revision of Reply Memorandum regarding Motion to Reopen Case and to Enforce Settlement; finalize Jonathan Ahn's Affidavit
6/20/03	J. Ahn	0.5	\$127.50	Review and revise Reply Memorandum and Affidavit of Jonathan Ahn
		15.3	\$2992.50	

Rates:	Jonathan Ilson Ahn	\$225/hour	Total Hours: 5.3
	Kenneth S. Knuckey	\$190/hour	Total Hours: 7.7
	Donald S. Keough	\$140/hour	Total Hours: 1.2
	Tammy S. Lenon	\$140/hour	Total Hours: 1.1